



Daniel Rosen Counsel

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Biography

Daniel Rosen is of Counsel at Kostelanetz LLP. He is a veteran trial lawyer with over 24 years of experience in private practice and with the IRS Office of Chief Counsel.

Over the course of his career, Dan has litigated some of the largest, most complex, and most sensitive tax cases before the United States Tax Court. Dan has litigated precedent-setting cases involving a wide variety of international and domestic tax issues, including tax incentive syndications, partnerships, civil fraud, leasing transactions, transfer pricing, hybrid instruments, regulatory challenges, corporate and individual tax shelters, and research and development tax credits. In addition, Dan has significant experience representing clients in tax and tax related disputes before the federal district courts and the Court of Federal Claims. Dan is ranked by Chambers USA (New York-Tax) and is recognized by Legal 500 as a Recommended Lawyer (U.S. Taxes-Contentious).

During his time with the IRS Office of Chief Counsel, Dan served as a Special Trial Attorney and was a key participant in the drafting of published guidance and administrative directives involving judicial doctrines for the IRS Large Business and International Division (LB&I). Dan is a frequent speaker for George Washington University School of Law, the Practising Law Institute, Tax Executives Institute, the Global Business Alliance, and the American Bar Association.

Dan graduated from the Maurice A. Deane School of Law at Hofstra University, where he served on the editorial board of the Hofstra Law Review. Aside from his work with Kostelanetz LLP, Dan is Senior Counsel with an international law firm, where he consults on federal tax disputes and regularly authors articles on tax practice and procedure.

Dan works out of Kostelanetz LLP's New York office and previously was an attorney at WELTY PC until that firm combined forces with Kostelanetz in June 2024.

Education

- B.A. Hofstra University (1991)
- J.D. Maurice A. Deane School of Law at Hofstra University (1996)

Bar Admissions

- New York